

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI, INC.,
OPENAI LP, OPENAI GP, LLC, OPENAI, LLC,
OPENAI OPKO LLC, OPENAI GLOBAL LLC,
OAI CORPORATION, LLC, and OPENAI
HOLDINGS, LLC,

Defendants.

Civil Action No.
1:23-cv-11195 (SHS) (OTW)

PLAINTIFF'S MOTION TO SEAL

Under paragraph 21 of the Stipulated Protective Order in this case (*Daily News* Dkt. 129), Plaintiff The New York Times Company (“The Times”) respectfully seeks to provisionally file under seal portions of its letter motion to compel. The letter motion addresses a discovery dispute—specifically, The Times’s request for an order compelling OpenAI to produce certain financial information. The Times seeks to file portions of this letter motion under seal because an exhibit to the motion was designated as Protected Discovery Material by OpenAI under the Protective Order. The Times does not affirmatively seek to seal any material. Under the Protective Order, OpenAI has five business days to file a statement of reasons for why the material should be sealed. The Times will review OpenAI’s filings, and if necessary, confer about any disagreement.

Dated: March 31, 2025

/s/ Ian Crosby

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